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October 31, 2022

VIA ECF

Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Room 740
New York, NY 10007

Re: Fashion Leaf Garment Co., Ltd. v. Ringer Jeans LLC, et al.
Case No. 19-cv-03381 (ALC) (BM)
Status Report and Request for Extension of Summary Judgment Deadline

Dear Magistrate Moses:

This Firm represents Plaintiffs in the above referenced matter. As required by the Court's October 17, Order, I respectfully write with the consent of all other counsel to update the Court on the status of the matter.

The deposition of Alex Zhao, Fashion Leaf's principal, was taken on October 7 and 10. The deposition of Charles Azrak, principal of the Defendant companies, was taken on October 14 and 20. During Mr. Azrak's deposition, counsel for Anhui made requests for Defendants to update their document production with respect to two topics based on Mr. Azrak's testimony. The Defendants expect to produce those requested documents later this week. The contents of those documents will dictate whether Anhui seeks additional deposition time with Mr. Azrak. Other than those remaining issues, however, which should be resolved quickly, the parties have completed fact discovery.

The parties note that the present summary judgment deadline is November 10, 2022 (it was set in the Court's July 29, 2022 Order). Given that the discovery schedule has been extended since the July 29, 2022 Order and given that the deposition transcripts have not even been created for all of the recently-completed depositions, the parties respectfully request that the deadline to move for summary judgment be extended for at least thirty days.

In addition, the defendants and Fashion Leaf believe that mediation would be beneficial and request that the Court schedule mediation or permit them to engage in third-party mediation, prior to the deadline to move for summary judgment. Anhui does not believe mediation would be beneficial and does not want to participate in any mediation at this time.

On behalf of all parties, we thank Your Honor for your consideration of the foregoing.

Respectfully yours,


Michael Cassell

cc: All counsel (via ECF)